

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Complaint of Brooklyn, N.Y. Local 251
and consumers of the USPS

Docket No.

COMPLAINT OF Brooklyn N.Y Local and consumers
REGARDING Consolidation AMP for June 2013

April 8th, 2013

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- I. 1. The USPS has announced their move to take originating mail from June 2013 until the end of summer 2013 from the Brooklyn P & DC in New York. This action violates the Postal Regulatory Commission's mission to hold the Postal Service accountable, be in compliance, and remain financially secure. HR6407 (109th) Postal Accountability and Enhancement Act Section 302 POSTAL FACILITIES (C) (D) (ii) Section 302. Postal Service Plan C 3 CONTENT OF FACILITIES PLAN

2. The AMP study done in 2011 is outdated, not accurate; changes have occurred in staffing, savings have been captured through new low wage employees, and the communities potentially affected was not provided adequate public notice.

3. NLRB Ruling (3-1-2013) USPS must provide un-redacted copies of completed AMP Feasibility studies with supporting data; management has failed to do so prior to any decision to approve a study, and continues not to provide information requested including updated information.

4. USPS failed to provide all evidence collected from the public in December of 2011 falsification of actual public concerns and comments as well as legislative members concerns missing from reports. New public meeting is requested after USPS provides information as per NLRB Award and requesting PRC to use their enforcement tools to direct the Postal Service to stop Brooklyn P & DC AMP implementation until section 302 C1 (c) and (d) wherein the Postal Service needs to continue to revise its network to meet the new conditions of the plant as well as keep unions informed, elected officials informed and are required to abide by procedural requirements contained in the national agreements and 302 C 3 A,B,C,D wherein new identification of costs and savings be completed and then make a new decision based on the updated facts.

II. Requesting that the PRC ensure that the postal system is accessible, transparent, and financially secure by using their enforcement tools and subpoena power and authority to direct the Postal Service to stop any further AMP implementations of the 55 targeted sites for this summer of 2013, due to unreliable data, and failure to comply with applicable postal

laws including the Postal Accountability and Enhancement Act and Title 39 USC.

- III. There has not been a true study on the affects of closings or consolidations of the plants on small and large businesses within the communities. These 55 plants are many times the back up for mail processing when there are power outages, storms, and catastrophes. Many of these plants have the bio-hazard detection systems for Anthrax such as Brooklyn ,N.Y. to provide safety to customers as well as employees that are necessary during emergencies.**
- IV. Network rationalization has been based on false savings, estimates inaccurate data, and will have maximum adverse impact on customer service, business mail entry, and retail/delivery service will change drastically. No new notification. The 55 AMP implementations for 2013 will affect Service Standards and fail to promote the USPS as a reliable, efficient and relevant for the future. Section 302 of the Act states the Postal Service has to revise its distribution network to meet changing conditions and must best suit operational needs yet they have failed to update after so many changes have been made at these facilities over the last 2 years.**
- V. The Brooklyn P &DC is self-efficient, located in a prime area for easy access to major highways and sets on the back of JFK airport. The USPS owns this building so there is no lease/rent cost. The AMP move to send Brooklyn's mail to a Morgan Facility then bring it back to Brooklyn to be delivered to the 3 million customers in Brooklyn does not seem rational. The Morgan plant is at maximum throughput and space to handle any new volume. Brooklyn has the most modern equipment and building structure in the area. The Brooklyn area is the largest growing area in New York City and when you factor in that it takes upwards to 90 minutes just one way to get to Morgan P & DC during business hours. The cost savings is very minimal when time on the road is factored in.**

- VI. We have requested the evidentiary support as per the NLRB Award and still have not received it. We are requesting new studies as we are in need of the most updated report since changes have occurred in staffing, low wage earners (Pses), and mail volume increases in parcels. Transparency needs to be enforced by the PRC.**
- VII. The 55 AMP sites accelerated for Advance Implementation scheduled for the summer of 2013 need to be addressed by the PRC. These studies are outdated, and the Union Representatives were denied AMP Feasibility studies and PIRs. NLRB ruled we have the right to these studies and they should be given prior to a public meeting as well as prior to a public meeting as well as prior to a decision to implement. We still have not received anything.**
- VIII. The remedy requested is that the PRC utilize their enforcement tools and direct the USPS to cease implementation of the 55 sites to be consolidated. Cease movement of any mail and equipment from any of the 55 plants. The PRC needs to use their subpoena power and authority to force new AMP studies due to the old studies being outdated. They do not reflect new savings and less staffing that has occurred due to retirements. The study should include the new rise in parcels and 3rd class mail volume. Stop the USPS from changing the service standards when they implement their old plans which does not show any new work in the 55 sites.**
- IX. The USPS has continued to keep the employees, the unions, the customers, the community and the PRC in the dark as to the adverse affects of all the closings and consolidations. We are being used as pawns so that pressure is placed on Congress to do their job and release the USPS from PAEA requirements to pay into the health plan fund 75 years in advance, and to attempt to recoup the overpayments made over the years that have not been returned to the USPS. This is being done at the detriment of the communities and the workers.**
- X. Postal Service by emailing it to PRCCOMPLAINTS@usps.gov.]**
- XI. Mr. Morris Brailsford, President Brooklyn NY local 251**